

TUVQIPÄÜÖPVOÖ  
Kevin H. Sharp

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 3:13-cr-00059
	)	CHIEF JUDGE SHARP
	)	
JASON GLYNN	)	

**UNOPPOSED MOTION TO EXTEND DEADLINE FOR FILING OF MOTION FOR  
JUDGMENT OF ACQUITTAL (FED. R. CRIM. P. 29)**

Undersigned counsel, William J. Steed III, on behalf of the Defendant, Jason Glynn, respectfully moves this Honorable Court to grant an extension of the deadline for the Defendant to file a Motion for Judgment of Acquittal, and/or to renew such Motion, pursuant to Fed. R. Crim. P. 29(c). The defense respectfully seeks an extension to February 1, 2016, approximately 30 days from the current deadline. The defense contacted Assistant United States Attorney Bill Abely, and Mr. Abely advised that the Government does not oppose an extension.

In support of this Motion, undersigned counsel submits the following:

(1) As noted above, the Government does not oppose an extension of the deadline, so this an unopposed request for an extension.

(2) Fed. R. Crim. P. 29(c)(1) governs the "Time for a Motion" for a judgment of acquittal, and provides that a "defendant may move for a judgment of acquittal, or renew such a motion, within 14 days after a guilty verdict".

(3) The jury returned its verdict on December 14, 2015. The "14 day" deadline set forth by Fed. R. Crim. P. 29(c)(1) would thus require counsel to file such a motion on or about December 28-30, 2015, immediately after the Christmas holiday, with the exact date depending on the holiday dates set by the local Courts.